



RECEIVED
OPPT CBIC

AR20-13773

2002 MAY 29 AM 11:50 Functional Chemicals

May 15, 2002

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attn: Chemical Right-To-Know

Re: Additional Information on Trixylenyl Phosphate HPV Test Plan
CAS No. 25155-23-1

Akzo Nobel Functional Chemicals LLC is pleased to provide you with the following additional information regarding the substantial effort undertaken to identify all available health and environmental tests conducted with Trixylenyl Phosphate. Every effort was made to be as inclusive as possible, so as to minimize the need for further testing.

The company's product files were searched for any final reports, raw data, or other technical information pertaining to Trixylenyl Phosphate. Trade associations were asked to review their files for reports or technical information on the chemical substance. Several electronic databases were extensively reviewed by chemical name, synonyms, and by CAS number, to identify reports, technical articles, books, or other publications that noted Trixylenyl Phosphate. The Toxicology Data Network (TOXNET) databases searches included the Hazardous Substances Data Bank, Toxline, and the Developmental and Reproductive Toxicity Data Base. In addition, the Safety Information Resources Inc. database was searched. PubMed, an electronic database of the National Library of Medicine, was also searched for publications in which Trixylenyl Phosphate is discussed. Information obtained from these electronic resources was included in the Robust Summaries submitted to the EPA.

A substantial number of aromatic phosphate esters exist and they show very different toxicologic properties. Certain of these aryl phosphates are neurotoxic and adversely affect reproduction. Others do not demonstrate target organ toxicity. It is thus not possible to use structure-activity relationships to accurately predict the toxicologic potential of an aryl phosphate. Akzo Nobel Functional Chemicals believes that Trixylenyl Phosphate should be independently tested because it consists of a complex mixture of at least 50 isomers and its toxicologic properties cannot be predicted from data on other aryl phosphates.

Akzo Nobel Functional Chemicals LLC
5 Livingstone Avenue
Dobbs Ferry, New York 10522-3407
Tel. (914) 674 5000
Fax (914) 693 4487

MR-59101

The company is committed to the guidelines defined in the October 14, 1999 letter, and they have been carefully considered in the development of the Test Plan. To minimize the number of animals to be used, we plan to use OECD Guideline 422 which combines a repeated dose oral toxicity component with reproduction/developmental toxicity screening in rats. The genetic toxicity endpoints would be satisfied using *in vitro* tests.

We ask that you post this supplemental information on the Environmental Protection Agency HPV Challenge web site.

Very truly yours,

William F. Gentit
Manager, Regulatory Affairs

cc: Jim Keith – American Chemistry Council
Kelly Triplett – Akzo Nobel Chemicals Inc.